

# CSWG/NIST Smart Grid Privacy Subgroup

## August 17, 2012

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### Attendance:

- Rebecca Herold – The Privacy Professor
- Amanda Stallings – PUCO
- Ken Wacks – GWAC
- Sarah Cortes – Inman Tech
- Krystina Schaefer – PUCO
- Roger Jaffe – FriiPower
- Lee Tien – EFF
- Paul Zumo – APPA
- Ward Pyles – Southern Co.
- Tanya Brewer – NIST
- Chris Villarreal – California PUC
- Tony Munoz – Colorado PUCO
- Brandon Robinson – Southern Co.
- Marianne Rawls - NRECA
- Christine Hertzog – SG Library
- Dan Francis - AEP

### NISTIR Update/Update:

This project is a divide and conquer approach. Our goal is to get the section that was published in 2010 updated with new information and incorporating our newer work products. This is NOT a wholesale replacement – just an update.

- ✓ 5.3 LEGAL FRAMEWORKS – Sarah – we have 32 members on the team as of today. There is excellent representation from all sectors. We had our first meeting on Tuesday – very productive. There were not a large number of things that needed to be changed. We are going to delete the section enumerating SG laws and try to find a replacement. We are also updating the footnotes and referencing national security letters, Golden Valley case, etc. We are reminded that there are also opt-out provisions in some states. The plan is to deliver final drafts September 4. We will be circulating the draft internally this week. Next meeting is Tues Aug 21, at noon EDT. The GoToMeeting information is the same as last week. If you need it, please contact [Tanya](#).
- ✓ 5.4 CONSUMER to UTILITY PIA – Rebecca & Tanya – have not had a chance to discuss the section to date. Rebecca will contact Tanya directly to determine a game plan.

- ✓ 5.5 PERSONAL INFORMATION – Amanda & Tanya – 3 on our team (including Leonard Tillman). We met on Wednesday from 3-4 to work on the first set of edits. The edits were posted on the Twiki and we are meeting next week at the same time.
- ✓ 5.6 IN-DEPTH PRIVACY CONCERNS – Tanya – 8-10 on the team. We have met twice so far. We've gotten a third to halfway done. Edits are posted on the Twiki. We are meeting next Monday afternoon to discuss more edits.
- ✓ 5.6.5 (OLD) 5.7 (NEW) 3<sup>RD</sup> PARTY DATA ACCESS – Brent & Tanya – Brent sent an outline to Tanya who looked it over. This will not be a long section but an outline has been circulated.
- ✓ 5.8 (NEW) PEV PRIVACY – Mike Coop – No movement on the section to date. Rebecca to contact Mike for an update
- ✓ 5.9 NSTIC ISSUES – Amanda – We met on Wednesday to go over the plan for drafting language into the updated NISTIR. The section will be two paragraphs maximum and will discuss the NSTIC project, why it was created and how it may affect smart meter data and/or privacy. The NSTIC Plenary held its kick-off meeting this week in Chicago but is still ironing out some bugs in the charter and by-laws. The release date of the pilot projects has been pushed back again to mid-September. The group is calling on anyone who knows of a utility-sponsored pilot project submission to come forward and share it with the group. That person's knowledge will be kept in strictest confidence within the group. If you have any information, please contact [Amanda](#).
- ✓ 5.10 AWARENESS AND TRAINING – Rebecca - team has created several training slide sets for various target groups. Now that the 3<sup>rd</sup> party recommendations paper has been submitted to NIST privacy experts for review, we are prepared to create the training slides for 3<sup>rd</sup> party actions. 14 people on the distribution list to date. Next meeting is this Monday. Rebecca sent a training slide set to use as a template. This should be a relatively easy effort since we have already created sets for other groups. We also need to create the draft for this section of the next version of NISTIR 7628 Vol 2 to provide a discussion of the importance of awareness and training activities for all types of entities involved within the smart grid, describe our team's work, point to all the set of training slides we've created, and describe how they can be used to support each entity's own internal privacy education efforts. Also need to figure out how to point to the slide sets from the updated NISTIR. It would be good to see folks getting involved who have not participated much to date, but who have strong opinions about this. This goes for all the other sections as well. If you would like to volunteer for this effort, either working on the slide sets and/or drafting the section, please contact [Rebecca](#).
- ✓ 5.7 MITIGATING RISK – Christine – Need update the existing content about mitigating risk and then launch into discussion about our use cases. We didn't spend much time on this section with regard to other possible privacy frameworks and risk mitigation methods before, so it needs concentration. The team is wrapping up the edits and reviews of the use cases. Also began crafting some fresh content regarding the descriptions that will be included in the use case update. Team members were given assignments yesterday. We will do another round-robin review before submission. This should be a quick effort. Please have your assigned content for the NISTIR to Christine before next Thursday.

## Miscellaneous:

- We are going to have guest speakers at our Aug 31 meeting. Ken Wacks is going to discuss some of the new ISO energy standards that are out there. Tim Schoechle will also provide discussion of a new privacy standard. Tim was one of the primary writers for ISO/IEC 15944-8, *Identification of privacy protection requirements as external constraints on business transactions*. Ken will describe the new standards he worked on, addressing the privacy aspects; specifically the gateway. Tim will address the framework issues within the standard he worked on that address privacy.
- Chris – general issue/question about the privacy section. When he was on the 5.6 team calls, it occurred to him that throughout the privacy section there are statements indicating that smart meters show appliance usage. Chris does not believe that is a 100% accurate statement. Depending on granularity, the company may not be able to trace the signature. Statements need to be clarified so as to not confuse people as to what is likely and what is not. Meters have the capability but it is really dependent on the frequency of meter readings.
  - **Note to all teams:** Please – if you have metering statements in your section, clarify the statement so that it reflects more accurate information.
- Do we have any more clear data on what those granularity points are? Are they 1 minute, 15 minutes, more? What is the line between figuring out appliance use or not? Ken would hesitate to put something like that in the document because technology is steadily improving. May be possible a year from now – then NISTIR would be inaccurate.
  - In California, residential meters are collecting at an hourly rate; commercial and industrial are 15 minutes. Texas is 15 minutes across the board. Hourly data wouldn't reveal much but 15 minute may determine A/C use or pool pump.
  - Dan– we should be factual with what we know. Some data in the report about what the measurement intervals are. Consumption data or what's required to discern signal to noise ratios or appliance load monitoring. If the meter is just measuring certain attributes, we should state that. We should put something in the document that references this point in time (at the time of publication).
  - Ward – since this is being used as guidance for implementation of programs and creating baseline practices for utilities, this is good information for those in the sector and should be accurate at the time of publication.
  - Rebecca – data retention was to be included in Section 5.6. May not be able to see it today, but historical data has the ability to reveal things.
  - **Perhaps SME's in the group would be willing to draft a paragraph or two summarizing the above points, which would be useful. May just go into a footnote or within main text but would be appreciated.**
  - Oftentimes information is wanted by the customers, so those customers might want usage information available to compare energy usage before and after energy efficiency products. In some cases, they want to do solar arrays on the building.

There is a lot of other uses for data that customer may want. There needs to be balancing.

- Excellent points, but if you look at Julian Assange, or someone who isn't particularly sensitive of data, destroying the data a month after collection may be useful. Can individual consumers make those decisions? If usage data is necessary for auditing or tax purposes, that may take precedence over requested destruction. Some people claim that storage of data is harmful to them and their privacy.
- We want to consider permitted uses of information. If some sort of security breach is entailed, that has remedies that need to be devoted to that issue. It's important to define permitted and acceptable uses and then protect against unauthorized disclosure from a security standpoint.
- For those of you who made the points above, please draft your thoughts in writing and submit them to Tanya and Rebecca so they can be added to the updated NISTIR. *This is valuable information, please don't let the opportunity go by.* Christine will draft something on the risk management aspects and send it to Tanya. Please draft your comments in writing and send them to Tanya so she can include them in the updated 5.6 section. Also, Chris V. will be working with Ken, Brandon, Dan and possibly others to pull some language together.

Next meeting will occur on **August 31<sup>st</sup>, at 11:00 EDT**. Remember that we're having guest speakers during this meeting. Please plan to attend.